

AO 187 (Rev.07/87) Exhibit and Witness List

**United States District Court****SOUTHERN DISTRICT OF OHIO**

Jefferson-Pilot Life Insurance Co.

**EXHIBIT LIST****v.**

Case Number: 02-479

**Christopher L. Kearney**PRESIDING JUDGE  
**Michael R. Barrett**COUNTER-CLAIM PLAINTIFF'S  
ATTORNEY  
**Michael A. Roberts**COUNTER-CLAIM DEFENDANTS'  
ATTORNEY  
**William R. Ellis, John E.  
Meagher**TRIAL DATE(S)  
**September 17, 2007**

COURT REPORTER

COURTROOM DEPUTY

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
	1				Christopher Kearney's Jefferson Pilot Disability Policies A. Policy H439029 B. Policy H00538069
	2				Christopher Kearney's policy application files A. Application dated 3/19/90 B. Application dated 5/28/91 C. Application dated 11/8/91
	3				Correspondence to/from Kearney contained in the JP/DMS claim file A. 1991 Correspondence B. 1993 Correspondence C. 1994 Correspondence D. 1995 Correspondence E. 1996 Correspondence F. 1997 Correspondence G. 1998 Correspondence H. 1999 Correspondence I. 2000 Correspondence J. 2001 Correspondence K. 2002 Correspondence L. 2003 Correspondence M. 2004 Correspondence N. 2005 Correspondence O. 2006 Correspondence P. 2007 Correspondence

\* Voluminous exhibit not being reproduced due to size.

\*\* Inclusion of an exhibit on this list does not waive any objections to admissibility of the exhibit.

**EXHIBIT AND WITNESS LIST – CONTINUATION**

AO 187A (Rev. 7/87)

Jefferson Pilot Life Insurance co. vs. Christopher L. Kearney					CASE NO. 02-479
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES
	4				Claim Forms A. 1993 B. 1994 C. 1995 D. 1996 E. 1997 F. 1998 G. 1999 H. 2000 I. 2001 J. 2002 K. 2003 L. 2004 M. 2005 N. 2006 O. 2007
	5				Non-Privileged Produced Claims File*
	6				Medical Records A. Dr. Ambrose Perduk B. Dr. Bret Ferree C. Dr. Otto Kausch D. Behavioral & Psychiatric Counseling/Elizabeth Henderson, PhD E. Dr. Martin Lehenbauer F. Donna Judd-McClure, PhD G. Shawn Barnhart, LISW
	7				Claim Payment Worksheets
	8				Christopher Kearney's Deposition Exhibits A. Signed medical authorizations B. Dr. Otto Kausch authorizations C. Nancy Kearney's Affidavit D. Nancy Kearney's Financial Affidavit E. Christopher Kearney's 1994 Affidavit F. Divorce - Judgment Entry dated 10/28/94 G. 10/31/94 Residual Form H. Letter to Mr. Roberson from Kearney I. Cincinnati Belting Complaint J. Answer/Counterclaim of Kearney K. Agreed Judgment Entry – Cincinnati Belting L. Kearney's Bankruptcy Case M. Melville letter regarding payment (Rogers v. Innomation) N. Motion to Enforce Settlement O. Garnishment Entry P. Back Rider Q. Kearney letter to Dr. Perduk R. Dr. Perduk's letter to the Bureau of Workers Compensation S. DJ v. Innomation Complaint T. Certificate of Judgment (CJ v. Innomation) U. Complaint (Baker v. Kearney)

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**EXHIBIT AND WITNESS LIST – CONTINUATION**

AO 187A (Rev. 7/87)

Jefferson Pilot Life Insurance co. vs. Christopher L. Kearney					CASE NO. 02-479
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES
	9				Articles of Incorporation A. Kearney Magnetics B. Kearney & Associates C. Kenwood Technologies D. Innomation
	10				Surveillance/Claim Investigation A. CS Claims Group B. Equifax C. NWI Investigations D. J.R. Levy E. Psychiatric Referral F. Medical Referral
	11				Christopher Kearney's Tax Returns A. 1993 B. 1994 C. 1995 D. 1996 E. 1997 F. 1998 G. 1999 H. 2000 I. 2001 J. 2002 K. 2003 L. 2004 M. 2005
	12				Lawsuits involving Christopher Kearney A. J.L. Grote B. Christopher Kearney v. Yoshiko Kearney C. Other cases
	13				Christopher Kearney's Credit Card Statements***
	14				Selected claims file documents
	15				JP/DMS training materials*
	16				Documents Produced by JP/DMS*
	17				JP customer surveys re: DMS
	18				All Exhibits on Kearney's Exhibit list
	19				Rebuttal Exhibits

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\*\*\* Awaiting documents per subpoenas and Court's order.

Defendants reserve the right to supplement this exhibit list depending on plaintiff's proof at trial.